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Attorneys for Defendant

6 State Farm Mutual Automobile Insurance Company

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 **PAMELA GROGAN, individually**

11 Plaintiff,

12 v.

13 **STATE FARM MUTUAL AUTOMOBILE**
14 **INSURANCE COMPANY, an entity**
15 **licensed to do business in**
16 **Nevada; DOES I through X; and**
17 **ROE CORPORATIONS, XI through**
18 **XX, inclusive**

Defendant

2:17-cv-01044-APG-VCF

*SUBMITTED IN COMPLIANCE
WITH LR 26-1(e) *

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**
20 **(THIRD REQUEST)**

21 Pursuant to Local Rules 6-1 and 26-4, the parties, by and
22 through their respective counsel of record, hereby stipulate to
23 and request that the Court extend the deadlines by thirty days.
24

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:

The following discovery has been completed by the parties:

1. Defendant's Initial Disclosure, pursuant to FRCP 26(f);
2. Plaintiff's Initial Disclosure, pursuant to FRCP 26(f);
3. Plaintiff's Responses to Defendant's First Set of Request for Admissions;
4. Plaintiff's Responses to Defendant's First Set of Interrogatories;
5. Plaintiff's Responses to Defendant's First Set of Request for Production of Documents;
6. Defendant's Responses to Plaintiff's First Set of Requests for Production of Documents;
7. The deposition of Kim Korich has been set for June 5, 2018;
8. The deposition of Plaintiff has been set for June 8, 2018;

B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Depositions of the Person Most Knowledgeable from Plaintiff's medical providers relevant to treatment rendered to Plaintiff since the date of this accident;
2. Deposition of Defendant's representatives;

3. Disclosures of Plaintiff and Defendant's experts;
4. Depositions of Plaintiff and Defendant's experts;
5. To the extent necessary, parties may also propound additional written discovery and/or follow up on the discovery already propounded.

A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:

Both parties have been working to move this matter forward. At this time both parties are requesting are requesting an additional thirty days to complete the remaining discovery. The parties have been trying to accommodate requests for depositions of Ms. Korich, and there was a recent medical issue that delayed the deposition of the plaintiff. Moreover, defense counsel had a seemingly firm trial in a matter shift, resulting in severe scheduling problems through most of April and into the first week of May. Both parties believe that the additional time will allow the parties to retain their experts and obtain the remaining depositions.

D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:

	Old Deadline	New Deadline
Discovery Cut off:	07/27/2018	08/27/2018
Amending Pleadings & Adding Parties:	04/26/2018	CLOSED
Expert Disclosure:	05/28/2018	06/28/2018

Rebuttal of Experts: 06/28/2018 07/30/2018
Dispositive Motions: 08/27/2018 09/28/2018
Pretrial Order: 09/27/2018 10/29/2018

**F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY DELAYIN
DISCOVERY OR THE TRIAL OF THIS MATTER.**

Dated: May 27th, 2018 Dated: May 27th, 2018

**RANALLI ZANIEL FOWLER & MORAN, HENNESS & HAIGHT
LLC**

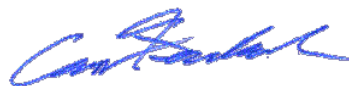
/s/ Benjamin Carman
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ORDER

IT IS SO ORDERED:

Dated: 6-11-2018



UNITED STATES MAGISTRATE JUDGE

If dispositive motions are filed, the deadline
for filing the joint pretrial order will be
suspended until 30 days after decision on the
dispositive motions or further court order.